

# JacksonLewis

**Jackson Lewis P.C.**  
766 Shrewsbury Avenue  
Tinton Falls NJ 07724  
(732) 532-6148 Main  
(732) 842-0301 Fax  
[jacksonlewis.com](http://jacksonlewis.com)  
James J. Panzini – Resident Managing Principal

JAMES J. PANZINI  
Direct Dial: 732-945-6025  
Email: [James.Panzini@jacksonlewis.com](mailto:James.Panzini@jacksonlewis.com)

April 15, 2021

**VIA ECF**

The Honorable Andre M. Espinosa  
United States Magistrate Judge  
for the District of New Jersey

Re: *Reshma Abell v. Pacira Pharmaceuticals, Inc., et al.*  
Docket No.: 18-cv-16509 (MCA)(AME)

Dear Judge Espinosa:

This Firm represents Defendants Pacira Pharmaceuticals, Inc., Rich Kahr, Peter Murphy, Glenn Reiser, Dennis McLoughlin, and Paul Ciavolella (hereinafter as, “Defendants”) in the above-captioned matter. Pursuant to the Amended Scheduling Order dated February 2, 2021 (ECF No. 77), Defendants are permitted to file a motion for summary judgment on or before April 23, 2021. We write to respectfully request a fourteen day extension of Defendants’ time to file a summary judgment motion from April 23, 2021 to May 7, 2021. This is the Defendants’ first request for an extension of this deadline, and Plaintiff’s counsel consents to this request.

We thank the Court for its consideration of the foregoing request.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ James J. Panzini  
James J. Panzini

C: All Counsel of Record (via ECF)  
4819-6112-1510, v. 1